

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	x	
In re SECURITY CAPITAL ASSURANCE	:	Civil Action No. 07-cv-11086 (DAB)
LTD. SECURITIES LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	NOTICE OF MOTION FOR
	:	RECONSIDERATION OF THE COURT'S
ALL ACTIONS.	:	APRIL 23, 2008 ORDER CONSOLIDATING
	:	ACTIONS, APPOINTING EMPLOYEES'
	x	RETIREMENT SYSTEM OF THE STATE
		OF RHODE ISLAND AS LEAD PLAINTIFF
		AND APPROVING OF ITS SELECTION OF
		LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investors United Food & Commercial Workers Union Local 655, AFL-CIO, Food Employers Joint Pension Plan (“United Food & Commercial Workers Pension Plan”) and District No. 9, I.A. of M. & A.W. Pension Trust (“District No. 9 Pension Trust”) pursuant to Local Civil Rule 6.3 and Fed. R. Civ. P. 59(e) and 60(b), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): granting reconsideration of the Court's April 23, 2008 Order consolidating the actions, appointing the Employees’ Retirement System of the State of Rhode Island as Lead Plaintiff and approving of its selection of Lead Counsel, and in its place, appointing United Food & Commercial Workers Pension Plan and District No. 9 Pension Trust as Lead Plaintiffs and approving their selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel. In support of this Motion, United Food & Commercial Workers Pension Plan and District No. 9 Pension Trust submit herewith a Memorandum of Law, dated May 8, 2008.

DATED: May 8, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
MARIO ALBA, JR.

*/s/ David A. Rosenfeld*  
\_\_\_\_\_  
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Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I, David A. Rosenfeld, hereby certify that on May 8, 2008, I caused a true and correct copy of the attached:

Notice of Motion for Reconsideration of the Court's April 23, 2008 Order Consolidating Actions, Appointing Employees' Retirement System of the State of Rhode Island as Lead Plaintiff and Approving of Its Selection of Lead Counsel; and

Memorandum of Law in Support of Motion for Reconsideration of the Court's April 23, 2008 Order Consolidating Actions, Appointing Employees' Retirement System of the State of Rhode Island as Lead Plaintiff and Approving of Its Selection of Lead Counsel,

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel.

/s/ David A. Rosenfeld

David A. Rosenfeld

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LTD. SECURITIES LITIGATION	:	
	:	<u>CLASS ACTION</u>
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This Document Relates To:	:	[PROPOSED] ORDER
	:	
ALL ACTIONS.	:	
	X	

Having considered the Motion of United Food & Commercial Workers Union Local 655, AFL-CIO, Food Employers Joint Pension Plan (“United Food & Commercial Workers Pension Plan”) and District No. 9, I.A. of M. & A.W. Pension Trust (“District No. 9 Pension Trust”) for Reconsideration of the Court’s April 23, 2008 Order Consolidating Actions, Appointing Employees’ Retirement System of the State of Rhode Island as Lead Plaintiff and Approving of Its Selection of Lead Counsel and the Memorandum of Law, in support thereof, and good cause appearing therefore:

1. The Motion for Reconsideration is hereby granted;
2. United Food & Commercial Workers Pension Plan and District No. 9 Pension Trust are hereby appointed Lead Plaintiffs for the Class; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE